

**Commonwealth of Kentucky**  
**Division for Air Quality**  
***PERMIT STATEMENT OF BASIS***

Federally-Enforceable Conditional Major  
Northern Kentucky University  
Nunn Drive  
Highland Heights, KY  
June 6, 2003  
HERBERT CAMPBELL, REVIEWER  
**Plant I.D. # 021-037-00095**  
Application Log # 54674  
Permit # F-02-025

**Source Description:**

A construction/operating permit application was received from Northern Kentucky University on November 12, 2002. The applicant proposes to construct/operate two new natural-gas/backup #2 fuel oil fired indirect heat exchangers, and will relocate an existing natural-gas/backup #2 fuel oil fired indirect heat exchanger to the construction location to operate. In addition the source will continue to operate twelve existing natural-gas/backup #2 fuel oil fired indirect heat exchangers. The proposed facility modifications will result in emissions increases in excess of 100 tpy for sulfur dioxide and nitrogen oxides. The source is taking self-imposed limits to preclude the applicability of Title V requirements.

**Facility Location and Attainment Status:**

This facility is located in Campbell County, Kentucky. Campbell County was classified as attainment for TSP, sulfur dioxide, carbon monoxide, nitrogen oxides, and ozone. The source has the potential to be a major source for SO<sub>2</sub> and NO<sub>x</sub> emissions. However, the source has requested to be classified as a conditional major source with a federally enforceable limit not to equal or exceed 90 tons per year. The source is taking self-imposed limits to become a conditional major source and to preclude the applicability of Title V requirements.

**Regulation Applicability:**

All applicable regulations to the emission units are listed in the permit.

**Comments:**

A preliminary determination proposes that a draft permit may be issued as conditioned, but contingent to the satisfactory resolution of any adverse public comments which might be received.

Emissions were calculated based on AP-42.

Compliance with annual emissions and processing limitations imposed pursuant to Section 1c of the material incorporated by reference in 401 KAR 52:030, Section 5(8)b, and contained in this permit, shall be based on emissions and processing rates for any twelve (12) consecutive months.

In accordance with Regulation 401 KAR 52:030, Section 10, incorporating the standard requirements reference material Section 1b, source wide emissions for Sulfur Dioxide (SO<sub>2</sub>) and Nitrogen Oxides (NO<sub>x</sub>) shall not equal or exceed 90 tons per year on a consecutive twelve (12) month total.

The permittee shall adhere to the potential emissions limitations specified in the permit.

**Emission and Operating Caps Description:**

The source has the potential to be a major source for Sulfur Dioxide (SO<sub>2</sub>) and Nitrogen Oxides (NO<sub>x</sub>) emissions. However, the source has requested to be classified as a conditional major source with a federally enforceable limit not to equal or exceed 90 tons per year for Sulfur Dioxide (SO<sub>2</sub>) and Nitrogen Oxides (NO<sub>x</sub>). The source is limiting the indirect heat exchangers to 5840 hours per year of operation while burning No. 2 fuel oil, thereby limiting the potential emissions source-wide for SO<sub>2</sub> and NO<sub>x</sub> below 90 tons per year.

**Credible Evidence:**

This permit contains provisions which require that specific test methods, monitoring or record-keeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements.

At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.